

Vitellaro, Chandra

From: McClintock, Katie
Sent: Tuesday, February 16, 2016 9:19 PM
To: McCullough, Hugh; Fairchild, Susan; MONRO David (MONRO.David@deq.state.or.us)
Cc: Narvaez, Madonna; Johnson, Steffan; Pope, Anne; Dewees, Jason; Merrill, Raymond; Werner, Leslye; Doolan, Stephanie
Subject: RE: do you know a hexavalent chromium expert in OAQPS?

Thank you all for your thoughtful help.

Oregon DEQ is having a meeting with Bullseye Glass on Friday specifically about whether they can melt trivalent and/or hexavalent chromium without risks to surrounding people. **They have requested technical support for this meeting.**

The conversation centers around whether the total chromium monitored nearby is likely to be trivalent or hexavalent. The ambient total chromium concentration was 71.5 ng/m³ and if even a small fraction of that was hexavalent, that would be concerning. However, from the conversation below it sounds like hexavalent chromium emissions (whether from melting hex chromium or from conversion of tri chromium) may not persist and hex chromium in the ambient air. If this is the case it would be a wonderful sigh of relief for Bullseye who already can't make anything with red, orange and yellow (and green was the killing blow).

I am wondering if one or two people from this great group of hex chromium minds could participate in that call Friday and could pre-meet with ODEQ on Thursday. Based on the email traffic today, you all have a lot of knowledge to share with DEQ that would help inform their path forward on chromium.

Please let me know if you are able and if you all decide while I am out on inspections tomorrow, if you could **email David Monro directly as soon as possible** (MONRO.David@deq.state.or.us), that would be perfect!

Thanks.

Katie

From: McCullough, Hugh
Sent: Tuesday, February 16, 2016 1:36 PM
To: Fairchild, Susan <Fairchild.Susan@epa.gov>
Cc: Narvaez, Madonna <Narvaez.Madonna@epa.gov>; Johnson, Steffan <johnson.steffan@epa.gov>; Pope, Anne <Pope.Anne@epa.gov>; Dewees, Jason <Dewees.Jason@epa.gov>; Merrill, Raymond <Merrill.Raymond@epa.gov>; McClintock, Katie <McClintock.Katie@epa.gov>; Werner, Leslye <Werner.Leslye@epa.gov>; Doolan, Stephanie <Doolan.Stephanie@epa.gov>
Subject: Re: do you know a hexavalent chromium expert in OAQPS?

Hello all,

I am no longer with the Region 7 air program, but I agree with the points made by Stef. During the RTR for wool fiberglass, we had a couple sources test their Cr₆ emissions at the stack with 0061, and I recall from the field that it was challenging for them to get 'good' run.

R7 also conducted ambient air monitoring over a period of a month or two, but unfortunately I am out for training through April and do not have access to my notes. Stephanie Doolan from the R7 air planning group would probably be the best contact for information regarding the QAAP for that

monitoring. I should know, but I can't confirm if the monitoring was for total chrome or if it was speciated. I have ccd Stephanie, as well as my previous supervisor, Leslye Werner.

Hope that helps. If there is anything else I can do to help in my limited capacity while I am away, please let me know.

Hugh

Sent from my iPhone

On Feb 16, 2016, at 4:21 PM, Fairchild, Susan <Fairchild.Susan@epa.gov> wrote:

<image002.gif>

Hugh McCullough 913-551-7191

Susan Fairchild
Senior Environmental Scientist
(919) 541-5167

USPS Address:
OAQPS/SPPD/MMG
Mail Code D 243-04
Research Triangle Park, NC 27711

From: Narvaez, Madonna
Sent: Tuesday, February 16, 2016 3:46 PM
To: Johnson, Steffan <johnson.steffan@epa.gov>; Pope, Anne <Pope.Anne@epa.gov>
Cc: Fairchild, Susan <Fairchild.Susan@epa.gov>; Dewees, Jason <Dewees.Jason@epa.gov>; Merrill, Raymond <Merrill.Raymond@epa.gov>; McClintock, Katie <McClintock.Katie@epa.gov>
Subject: RE: do you know a hexavalent chromium expert in OAQPS?

What is R7 Hugh's last name?

From: Johnson, Steffan
Sent: Tuesday, February 16, 2016 11:36 AM
To: Narvaez, Madonna <Narvaez.Madonna@epa.gov>; Pope, Anne <Pope.Anne@epa.gov>
Cc: Fairchild, Susan <Fairchild.Susan@epa.gov>; Dewees, Jason <Dewees.Jason@epa.gov>; Merrill, Raymond <Merrill.Raymond@epa.gov>
Subject: RE: do you know a hexavalent chromium expert in OAQPS?

Madonna,

In my experience hexavalent forms of chromium are not stable when they are emitted from a source. In fact, EPA has put a good bit of effort into developing a test method designed specifically to capture hex-chrome compounds and keep them in hex form until analysis, as other chromium emissions test methods tend to let the chromium convert to trivalent forms. It is also my understanding (though certainly not the final word on the topic at all) that hex chrome emissions are likely to change state to trivalent chrome post-emission. I believe Jason DeWees and Ray Merrill of my group may also have information to add here, and so I am copying them on this e-mail.

The only reliable test approach that I know to quantify in-stack emissions of hex-chrome is to use a test method known as SW-846-0061. This method uses an alkaline reagent to trap hex-chrome and retain it in hexavalent form until the alkaline solution can be analyzed at a lab. The test method is a bit tricky, but if you need to know in-stack emissions we're certainly available to help you walk through development of a test protocol.

As to ambient sampling for hex chrome, I'll let Hugh in R7 tell you what he knows, my experience stops at the stack.

Please let us know if we can be of further assistance.

Stef

From: Narvaez, Madonna

Sent: Tuesday, February 16, 2016 12:26 PM

To: Pope, Anne <Pope.Anne@epa.gov>

Cc: Fairchild, Susan <Fairchild.Susan@epa.gov>; Johnson, Steffan <johnson.steffan@epa.gov>

Subject: do you know a hexavalent chromium expert in OAQPS?

Importance: High

Hi, Anne, Susan and Stef. Hope all is well. I don't know if you have heard about the colored glass manufacturer in Portland that DEQ discovered a cadmium hotspot around the facility. In the course of investigations, we discovered that the facility uses Cr+6 as a dry colorant for the glass. Ambient monitoring showed an average of 71.5 ng/m3 of total chromium. I don't know if Katie McClintock, the R10 enforcement contact has asked you for this information yet. If you can point us towards someone, we would really appreciate it. The company uses both Cr+3 and Cr+6, as well as cadmium and arsenic. In the next round of monitoring, the ODEQ will be monitoring for Cr+6 at the day care center, which is 220 meters from the facility. A cadmium hotspot was also detected close to the Harriet Tubman School. A much smaller colored glass mfg facility is close by.

- Katie McClintock did a cursory search for information on the conversion of trivalent chromium to hexavalent chromium and found little information, all of which was talking about smelting and coating. The research confirmed that the use of trivalent chromium alone can still produce hexavalent chromium, but found little data on the conversion rate under various circumstances. We need to develop or find an expert who can read more literature and help interpret the data we find in stack tests and ambient monitoring.

Thanks!

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Madonna Narvaez

Regional Air Toxics Coordinator

USEPA, Region 10

1200 Sixth Avenue, Ste 900

MC: AWT-150

phone: 206-553-2117

fax: 206-553-0110

narvaez.madonna@epa.gov

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